

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation Into Ameritech Wisconsin
Operational Support Systems

6720-TI-160

STIPULATION

1. WHEREAS the undersigned parties to this proceeding ("parties") have engaged in numerous prehearing conferences to address numerous issues related to Ameritech's Operational Support Systems (OSS); and
2. WHEREAS a number of issues have been identified on the Issues List adopted in this proceeding; and
3. WHEREAS the parties have prefiled testimony to present their respective positions on the matters set forth in the Issues List; and
4. WHEREAS the parties have continued their discussions on these issues concurrent with the filing of this testimony and have reached a mutually acceptable resolution of several of these issues as set forth in the Resolution of Specified OSS Enhancements and Process Improvement Issues, which is attached to this Stipulation; and
5. WHEREAS the parties believe that the resolution of these issues as set forth in the Attachment is in the public interest for at least the following reasons:
 - The resolution will permit the timely implementation of OSS solutions that will permit Ameritech to provide products and services to CLECs

- • more efficiently and will permit CLECs to obtain products and services from Ameritech more efficiently with the objective of facilitating the development of competition in Wisconsin.
- The resolution addresses highly complex, technical OSS issues in a collaborative manner that is efficient and fair to the interests of all parties and consistent with the public interest.
- The parties believe that the resolution of these issues strikes an appropriate balance of the interests of CLECs and Ameritech related to certain OSS enhancements and process improvements to the benefit of consumers through the facilitation of competition in Wisconsin.
- The resolution will reduce the number of issues that require resolution by the Commission, thereby permitting the Commission to focus its resources on deciding those issues that remain outstanding.

WHEREFORE, the undersigned parties respectfully request that the Commission enter an Order in this proceeding consistent with the Resolution of Specified OSS Enhancements and Process Improvement Issues as set forth in the attachment, as supplemented by the record in this docket.

Dated this 30th day of November, 2000

AMERITECH WISCONSIN

By _____

AT&T COMMUNICATIONS OF WISCONSIN, INC.

By _____

TCG MILWAUKEE

By _____

CORECOMM WISCONSIN, INC.

By _____

McLEODUSA TELECOMMUNICATIONS SERVICES, INC.

By _____

TDS METROCOM

By _____

WORLDCOM, INC.

By _____

RHYTHMS LINK, INC.

By _____

TIME WARNER TELECOMMUNICATIONS

By _____

BEFORE THE
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Operational Support Systems

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Resolution of Specified OSS Enhancements and Process Improvement Issues

I. Facilities Modification Process: Issue A/F

1. The facilities modification policy will require a delay notice, Form A, within 24 hours of receiving the original firm order confirmation (FOC) on or before April 1, 2001. Prior to that time Ameritech Wisconsin will use all reasonable efforts to provide such 24-hour notice prior to April 1, 2001. Ameritech will provide to the Staff and the parties a written report describing such efforts on a monthly basis beginning December 15, 2000.
2. Ameritech will not impose charges as proposed under the facilities modification policy if such charges would result in double recovery or discrimination or are otherwise inappropriate. The legal, policy and factual questions of whether such charges are appropriate and can be assessed should be deferred to the Commission's pending cost proceeding in 6720-TI-161. If the Commission determines that some or all charges are appropriate, the cost methodology used to develop the amounts of such charges will also be addressed in the pending cost proceeding in 6720-TI-161. Ameritech's testimony on this subject filed in docket 6720-TI-160 will be refiled in docket 6720-TI-161 on December 15, 2000. Subsequent testimony filings by CLECs and Ameritech will be consistent with the procedural schedule in docket 6720-TI-161. The parties will work jointly to seek to supplement the issues in docket 6720-TI-161 to ensure that this referral is adequately identified.

Until those issues are resolved by the Commission in 6720-TI-161, the parties agree that Ameritech will continue to calculate and track charges for such orders under the Facilities Modification Policy. For charges equal to or less than \$7,500 per order, Ameritech will not bill the CLEC pending the outcome of the Commission's decision in 6720-TI-161. For charges greater than \$7,500 per order, Ameritech will bill for such charges however, the CLEC requesting such work will be required to pay 50% of such charges to Ameritech. Ameritech will maintain an accounting of all such charges and amounts, and the parties agree to "true-up" all such

charges, whether billed or unbilled, based on the outcome of the Commission's decision in 6720-TI-161.

3. Ameritech represents that the only IDLC related charges Ameritech proposes to assess under its FMOD policy are for construction-related activities, which are defined as facility supplements or additions that are beyond the scope of simple or complex modifications. Ameritech will make all reasonable attempts to respond with a price quote for provisioning a UNE loop where an IDLC circumstance is presented in less than a 30-day period.
 - A. Ameritech will provide to the Commission and all parties to this Stipulation monthly reports relating to all orders that Ameritech believes should be subject to charges under its Facility Modification Policy, except for charges related to loop conditioning. At a minimum, this report must include for each order the following:
 1. Date of the Ameritech notice of delay in provisioning the order.
 2. Date of the Ameritech notice or form identifying the general nature of the work activities and any charges associated with the order.
 3. Date of the Ameritech notice or form for an IDLC-related order, identifying the general nature of the work activities and any charges associated with the order.
 4. Detailed description of all work activities required to complete the order, including, upon request, reports or work descriptions generated by the engineering staff assigned to the order.
 5. Revised due date communicated in the notice filed under 2 or 3 above.
 6. Actual completion date or pending status of the order
 7. Any charges that Ameritech considers applicable to the order.
 - B. Ameritech will perform a quarterly review of the reports filed under A above for the purpose of (1) determining whether Ameritech's current 30 day interval policy is appropriate and the extent to which the policy should be revised; and (2) clarifying the circumstances or activities that qualify as IDLC-related construction activities. These reviews shall be conducted jointly with Commission staff and parties to this Stipulation, subject to any confidentiality concerns. Within 30 days after completion of each review, Ameritech will submit a written report on the review to the Commission and the parties to this Stipulation. This report must, at a minimum, provide clarification of Ameritech's definition of IDLC-related construction activities and a rationale for Ameritech's interval policy for IDLC orders.

- C. Report information must be provided for Ameritech Wisconsin and, in aggregate, for the remaining Ameritech states.
4. Pursuant to the 13 State Change Management Guidelines and the CLEC User Forum Guidelines, Ameritech will propose the following change in the facility modification policy to the CLEC User Forum in December 2000:
- If the Good News Notice, Form D, is provided by Ameritech prior to the due date, the CLEC may:
 1. Retain the confirmed due date and Ameritech will work the order as scheduled, or
 2. Submit a supplemental order and Ameritech will provide a revised due date subject to the standard due date intervals from the supplemental order.
5. Ameritech will implement six performance measures for the Facilities Modification process. Additional performance measures for this process will be considered in the six-month review process upon CLEC request. The agreed performance measures are attached and are identified as follows: CLEC-W1, CLEC-W6, CLEC-W7, CLEC-W8, CLEC-W9, and CLEC-W11.
- Performance measures WI#4 – WI#7 as found in Exhibit F attached to the Temporary Administrative Law Judge's October 2, 2000 Report will be replaced by the performance measures noted above. Proposed measures CLEC-W2 and CLEC-W10 will be deferred to the 6-month review process.

III. Deferral of Implementation Dates: Issues F(2), H, and D

1. Ameritech did not meet certain implementation dates set forth in the Commission's July 19, 2000 Order in this proceeding. Ameritech restates here its commitment to full and complete compliance with the Commission's Orders implementing this Stipulation and all other Orders in this proceeding.

The parties agree not to pursue any claims they may have against Ameritech relating to Ameritech's failure to comply with the July 19, 2000 Order with respect to the implementation dates related to 865 Versioning, Sub-Loop Ordering and Abbreviated Address Validation. All parties reserve all rights to seek remedial relief associated with future claimed violations of this Stipulation, to the extent adopted by the Commission and other Orders in this proceeding.

.2. Ameritech will deploy the following OSS enhancements on the following dates:

- (a) Issue F (2): "865" Versioning (December, 2000 release)
 - (i) The substance of the "865" versioning will be as agreed to in Issue 148 (as described in Attachment A) during recent discussions related to the Uniform and Enhanced POR. Full refresh of supplemental orders will be implemented in the March 2001 release. The manual processes of the agreement will be implemented by February 14, 2001 as described in the attached document.
 - (ii) This stipulated settlement of this issue will be considered as applicable for all Ameritech states. No party to this Stipulation will pursue an alternative resolution to this issue in any OSS related proceeding in the Ameritech region, nor will any party advance a conflicting position on this issue in the FCC Uniform and Enhanced OSS proceeding.
- (b) Issue D: Sub-Loop Ordering (December, 2000 release)
- (c) Issues H: Abbreviated address validation (March, 2001 release)
 - (i) The determination of whether Ameritech should be required either to synchronize its Street Address Guide ("SAG") with its Customer Service Record ("CSR") for the Ameritech region; or to perform a one-time scrub of its SAG and CSR database to eliminate existing problems will be as required in the pending proceeding in Illinois Docket 00-0592.
 - (ii) Where CLEC orders are subject to a validation of street address, Ameritech's SAG will be the only source used to perform that validation. Similarly on pre-ordering input transactions, where an address is required the CLEC should use a SAG-valid address. On a prospective basis Ameritech will agree to fix discrepancies between the SAG and CSR as they are discovered in order processing.
 - (iii) This resolution of the address validation issue in paragraphs (i) and (ii) above is a compromise and settlement in this proceeding. It does not preclude any party from pursuing alternative resolution in other proceedings, however the fact of this settlement will not be used by any party in such proceedings.

VI. Hot Cuts: Issue G

1. Ameritech will conduct a dial tone/ANI test on the day of cut, as a matter of course. In addition, for those CLECs who desire, Ameritech will also conduct a dial tone/ANI test on DD-2. Ameritech recommends further collaboration to define the new routine process.
2. Ameritech will not charge CLECs for dial tone/ANI testing if done on a routine basis on DD-2 and /or on the date of cut. In addition, Ameritech will provide a dial tone/ANI test on a separate date as requested by the CLEC, subject to applicable charges.
3. Ameritech will engage in further collaboration to address the timing of notice if a dial tone/ANI test fails on DD-2 due to a CLEC trouble. Subject to the outcome of the collaborative, Ameritech will provide to the CLECs notice of a failed dial tone/ANI test conducted on DD-2 no later than 4 business hours after such test or by 10 am on DD-1, whichever occurs first. In addition, Ameritech will discuss potential procedures in the event a failure is found during such dial tone/ANI test performed on DD-2. However, in any event if a dial tone/ANI test is conducted on DD-2 Ameritech will perform another dial tone/ANI test as a matter of course on the date of cutover.
4. Ameritech will provide CLECs with status updates every two hours until the order is completed for all hot cuts that fail at the time of the originally scheduled cutover. In the case where trouble is reported after order completion, status will be available via Electronic Bonded Trouble Administration (EBTA) on a real-time basis.
5. Ameritech will implement "flags" for desired frame due times for Coordinated Hot Cuts (CHC) consistent with industry guidelines, if and when such flags are included in such guidelines upon a request from a CLEC and consistent with its then current Change Management Policy (CMP).
6. Ameritech will test and implement a "non-coordinated" frame due time hot cut process. Ameritech will continue to collaborate to define methods and procedures necessary for such process. Such discussions will begin in early December and will be concluded within 30-60 days. At the conclusion of such discussions such parties will file a joint report advising the Commission of all resolved and unresolved issues.

VII. Network Interface Devices: Issue O

1. Ameritech will move an internal "protector" or "station block" (which are defined as a grandfathered demarcation point that contains a non-jacked end (RJ11 or RJ21) type device) to an external location with a RJ-type device at no charge to the CLEC. Ameritech will perform such work, if it makes a customer premise visit for any reason, unless the customer specifically requests that protector, or station block not be moved. The protector or station block will be replaced with a RJ-jacked type device on

an external location and Ameritech will reconnect the new device to the customers existing inside wire, except if the end user specifically directs the location to be internal. This work will be performed at no charge. Ameritech will move a working internal NID to an external location at Ameritech's existing time and material charges on a nondiscriminatory basis for retail and wholesale customers if the CLEC places an order for such work. Ameritech will waive such charges for CLEC-requested NID moves for a period of six months from the date of the Order in this proceeding.

2. Performance measure CLEC-W5, which is attached, shall apply to this process. In addition a CLEC may request an audit of Ameritech's records to determine if protectors were not moved during previous technician visits. Such an audit by a CLEC may not be requested more frequently than every six months. A CLEC which requests such an audit will provide a list of orders where the CLEC required Ameritech to move a protector and Ameritech will audit its records to determine, if in any of those cases, a technician made a premises visit after the effective date of the Order in this proceeding. The results of this audit will be compared to the benchmark of Performance Measure CLEC-W5 and Ameritech will make an adjustment to the remedies paid in the previous six months to include the additional number of occurrences identified in the audit. This measure will be effective on or before the effective date of the Order in this proceeding.

VIII. Flow Through: Issue S

1. Ameritech will provide CLECs with a complete flow through listing, with complete exceptions, on or before April 15, 2001.
2. In April 2001, CLECs will provide Ameritech with a prioritized list identifying products/order types that CLECs seek to have flowed through over the next 24 months. The prioritized list will reflect those products or order types that CLECs currently provide or anticipate providing in significant volumes. The CLEC list will include Centrex resale.

Also in April 2001, CLECs and Ameritech will assign a target percentage of flow through exceptions that will be eliminated quarterly over the next 24 months for each prioritized product/order type. If agreement on such a target cannot be achieved, CLECs may utilize the formal dispute resolution process agreed to by the parties in this case.
3. Ameritech shall make a good-faith effort to attain significant improvements over the next 24 months in the flow through rate for the order/product types identified in the CLEC list provided under paragraph 1. Ameritech will set a percentage target for each order/product type that it believes represents a significant improvement for those order/product types.

4. By May 2001, Ameritech will provide a detailed project plan outlining the milestones it will report, on a quarterly basis to reflect progress in meetings for improving flow through.
5. The project plan, along with the CLECs' prioritized list, will be presented to the Commission for monitoring.
6. Quarterly, beginning on September 10, 2001, Ameritech will report providing details about how its efforts are progressing. These reports shall be filed with the Commission and served on all parties to the Stipulation. Ameritech's quarterly reports will be subject to Commission review. CLECs will have the opportunity to comment on the quarterly reports.
7. If CLECs believe that significant progress has not been made, they may petition the Commission to request a determination and to request penalties and other specific remedies, which may include payments to CLECs.

IX. Directory Listing and Ordering: Issue L

1. Ameritech will incorporate the functionalities of its OSS interface and Ameritech Advertising Services Electronic Data Interchange (EDI) interface so that CLECs can use a single Ameritech interface for service orders for directory listing on or before June 2001.
2. Ameritech will develop a preordering listing inquiry for all directory listings in Ameritech regional white page directories that are maintained by Ameritech Advertising Services (AAS), subject to the following conditions. By September 2001 Ameritech Advertising Services' existing GUI interface listing inquiry will be modified to allow CLEC access to the listings of other CLECs' end user customers (served by all order types) subject to AAS' legal restrictions or contractual obligations with other CLECs. In addition, this preordering directory listing inquiry function will be added to Ameritech's single preordering and ordering application-to-application and GUI interfaces by June 2002. Such enhancements will allow CLECs access to such listings of other carriers to the extent and in a manner consistent with Ameritech's legal restrictions and contractual obligations. Ameritech will work cooperatively with CLECs to enable such sharing of directory listings between CLECs, including but not limited to the development of a proposed model contract amendment to existing CLEC-AAS contracts. Parties to this Stipulation will not pursue an earlier or expanded resolution to this issue for Ameritech in either the FCC Uniform and Enhanced OSS proceeding or other Ameritech state proceedings.

The parties agree that the deployment of the functionality described in this paragraph will not be part of the third party test nor considered an entrance or exit criteria, of the Master Test Plan (MTP), as ordered in this proceeding; provided however, if such third party testing is still in

progress at the time Ameritech deploys the interfaces described in this paragraph (scheduled for June 2002) such interfaces shall be considered as part of such test.

3. Effective March 15, 2001, AAS will offer CLECs the option of receiving two pre-Business Office Close (BOC) reviews. The first pre-BOC will be provided 45 calendar days in advance of the directory close date. The second pre-BOC, if requested, will be provided 15 calendar days in advance of directory close. CLECs will be required to request the second pre-BOC 30 calendar days before the directory close date. There will be a \$200 charge for a second pre-BOC. In order for changes from the first pre-BOC to be entered on the second pre-BOC, CLECs must provide those changes at least 4 business days before the delivery of the second pre-BOC.

If at least 95% of the corrections requested after the first pre-BOC are not corrected in the second pre-BOC, the \$200 charge for the second pre-BOC will be waived. If at least 99% of the corrections requested from the first and second pre-BOC are not corrected in the final published directory, the remedy will be as described in the business rule in CLEC-W4. The remedy may include a requirement that AAS indemnify the CLEC against any claims by customers whose directory listings are not corrected as required by this policy.

The proposed performance measure CLEC-W3 will be considered in the six-month review process. Performance Measure CLEC-W4 shall apply to this policy.

X. Line Splitting/Line Sharing

1. Ameritech will provide line splitters for both line splitting and line sharing, as determined in the interconnection agreement approved by the Commission in the pending AT&T/Ameritech arbitration, Docket 05-MA-120 (Arbitration Award at 73-83), subject to its rights to seek appropriate review of the Commission's final determination. In the event the line sharing/line splitting provisions in the AT&T arbitration are modified by further Commission or judicial proceedings, the prevailing party in the further Commission or judicial proceeding may request that the Commission reopen this docket, for the purpose of considering whether the line splitting/line sharing provisions in the order in this OSS proceeding should be modified. Notwithstanding the forgoing, a CLEC may negotiate or arbitrate terms and conditions for the provision of line splitters that differ from the terms and conditions established in the pending AT&T/Ameritech arbitration.

XI. Dark Fiber

1. Ameritech will modify its tariffs regarding the recapture of dark fiber to read as follows:
 - A. Ameritech may reclaim dark fiber from a CLEC upon at least 12 months written notice to the CLEC only if:
 - (1) Ameritech negotiates with the CLEC in good faith to address the CLEC's concerns related to Ameritech's proposed reclamation, including issues related to coordination and timing for the purpose of minimizing service disruption;
 - (2) Ameritech demonstrates to the satisfaction of the CLEC or the Commission that Ameritech reasonably needs the dark fiber to meet its carrier-of-last-resort responsibilities within 12 months following the reclamation; and
 - (3) Ameritech provides the CLEC with an alternative facility with the same bandwidth the CLEC was using or had committed to use prior to Ameritech reclaiming the facility, provided the alternative facility does not result in any additional costs or charges to the CLEC or reduce the quality of the CLEC's services.
 - B. Ameritech and any interested CLEC may negotiate any alternative contractual terms and conditions for reclamation of dark fiber subject to mutual agreement or to arbitration of such terms.

XII. Master Test Plan

1. KPMG will supplement the Master Test Plan (MTP) to provide for manual processes, such as loop ordering and provisioning, a work force review or force and load analysis, that would identify work force additions necessary to accomplish manual ordering and provisioning requirements at certain increased future order levels of 150% and 200%.
2. KPMG will supplement the MTP to provide for the submittal of an independent reasonableness opinion by KPMG or another third party of the force and load outputs and conclusions for the workforce review of manual processes.
3. The parties understand that the volume and stress tests in the MTP are designed to include only flow-through eligible orders. To the extent such orders do not flow through, the MTP will include an accounting and a report on the outcome and performance for both the electronic and manual portions of the orders processed during the test.

XIII. Performance Measures

1. Performance Measures (PM) 70 and 70.1, dealing with call blockage will be implemented as proposed by Ameritech. Ameritech will provide CLEC proposed PM 70 on a diagnostic basis. This measurement will be known as PM 70.2. Such reporting will continue until the parties reasonably agree that the unique circumstances warranting the ad hoc trunk group level reporting no longer exist, or alternatively at that time one or more of the parties may seek inclusion of PM 70.2 as eligible for remedy payments.
2. Performance measures CLEC-W1, CLEC-W2, CLEC-W6 through CLEC-W11 and Performance Measures WI# 4 through WI# 7 as found in Exhibit F to the ALJ's October 2, 2000 have been addressed in issue I above.
3. Performance measures CLEC-W3 and CLEC-W4 have been addressed in issue IX above.
4. Performance measure CLEC-W5 has been addressed in issue IV above.

ISSUE F (2) -- 865 Versioning

Ameritech's design commitment for Provider Initiated Transactions ("Unsolicited 865")

In the interest of addressing CLEC concerns regarding the manner in which Ameritech provides 865 notices, and in the interest of improving processing of CLEC orders, Ameritech will implement Provider Initiated Transactions to notify CLECs of necessary changes that have been made to previously confirmed orders. In addition, Ameritech agrees to the following:

- (1) Ameritech will provide the Purchase Order Number (PON) and Version (VER) of the most currently processed LSR in its transaction which will allow the CLEC to associate the 865 to the appropriate LSR in its system.
- (2) In the design and operation of the work center processes it employs to create the 865s, Ameritech will ensure that its representatives consider order supplements that may also relate to the confirmation being modified and accommodate changes made by those supplements in the 865 notice.
- (3) Ameritech work centers staff will endeavor to keep 865 transactions to the minimum level necessary to ensure the efficiency and effectiveness of the 865-notification process.
- (4) Ameritech will provide for coding the transactions with a clear and unambiguous indicator(s) reflecting the underlying reason for the change in confirmation. The codes will assist Ameritech and CLECs in administering the performance measurements that relate to confirmations, jeopardies and the timeliness of the unsolicited 865s. E.g., codes assigned to jeopardy conditions for due date changes would be distinguishable from those for telephone number changes; codes for changes in service order numbers would be distinguishable from those for circuit number changes.
- (5) Ameritech will work collaboratively with the CLECs in the Phase III Category IV collaborative at the FCC in developing the underlying reason coding scheme consistent with industry standards and CLEC needs for information about the underlying reasons for the transactions. Refinements and changes in reason codes and 865 processes that arise in the future would be proposed and implemented consistent with the Change Management Process.
- (6) On or before February 14, 2001, Ameritech will implement the activities and work described in paragraphs (2) and (3) above. Ameritech will use the time before February 14, 2001 to conduct necessary training and internal work necessary to undertake the activities and work described in paragraphs (2) and (3) above.
- (7) All the Unsolicited 865 process improvements described in paragraphs (1)-(4) and (6) above will be made available in the March 2001 ordering release along with the implementation of the modifications to Ameritech systems to support full refresh supplemental orders by March, 2001 in the same manner as is utilized in the other SBC

regions. Implementation of the reason codes as agreed upon as described in (5) above will take place with the implementation of Phase II of the uniform ordering interface as described in the FCC Uniform and Enhanced OSS POR.